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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

JASON WADDELL, as Guardian Ad)
Litem of Lacee Danielle Marez,)
an incapacitated person,)

Plaintiff,)

-vs-)

No. CIV-11-1037-D

) BOARD OF COUNTY)
COMMISSIONERS OF CLEVELAND)
COUNTY, 2) JOSEPH LESTER, in)
his official capacity, 3))
CALISTA HULLETT f/k/a CALISTA)
HARLOW, individually and in)
her official capacity, 4))
JOHNATHAN JACKSON,)
individually and in his)
official capacity, 5) ESW)
CORRECTIONAL HEALTHCARE, LLC,)
an Oklahoma limited liability)
company, 6) SOONER MEDICAL)
STAFFING, LLC, an Oklahoma)
limited liability company,)

Defendants.)

COPY

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DEPOSITION OF DALANA PARKS
TAKEN ON BEHALF OF THE DEFENDANTS
IN OKLAHOMA CITY, OKLAHOMA
ON OCTOBER 8, 2013
COMMENCING AT 10:14 A.M.

* * * * *

REPORTED BY: BETH A. MCGINLEY, CSR, RPR-CP

CD/DVD
ENCLOSED

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S T I P U L A T I O N S

It is hereby stipulated and agreed by and between the parties hereto, through their respective attorneys, that the deposition of DALANA PARKS may be taken on behalf of the DEFENDANTS on OCTOBER 8, 2013, in OKLAHOMA CITY, OKLAHOMA, by Beth A. McGinley, a Certified Shorthand Reporter, pursuant to agreement and in accordance with the Federal Rules of Civil Procedure.

* * * * *

DALANA PARKS,
having been duly sworn, testified as follows:

* * * * *

EXAMINATION

BY MS. FAGAN:

Q Could you please state your full name for the record?

A Dalana LeeAnn Parks.

Q And you previously appeared at this office for your deposition on September 23rd, 2010; is that correct?

A Yes.

Q And we were unable to complete that deposition, correct?

A Yes.

Q Can you tell us why?

A Because I was not emotionally prepared for the

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1 questions about my past. I just felt -- I don't know,
2 kind of felt attacked at that time.

3 Q Are you prepared to give --

4 A I am.

5 Q -- your deposition today?

6 A I am.

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Q Okay. Have you gone by any other --

A Reeves is my maiden name, and I was married and
my last name was Windsor.

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Q And do you recall the circumstances of your arrest on September 17th of 2009 by a Cleveland County sheriff's deputy?

A Uh-huh.

Q Could you tell me about that?

A I got pulled over for not using my blinker and I had warrants.

Q Was anyone in the car with you?

A No.

Q And do you know what your warrants were for?

A It was for the open container in Cleveland

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1 County and for the assault -- aggra- -- aggravated
2 assault. Uh-huh.

3 Q So at least one warrant out of Cleveland County
4 and the --

5 A Uh-huh.

6 Q -- warrant from a separate county?

7 A Yeah, and -- well, actually, I had three. I had
8 one out of Pottawatomie County for unpaid fines.

9 Q Okay.

10 A Yeah.

11 Q So --

12 A I had three warrants.

13 Q Cleveland County, Pottawatomie County --

14 A And McClain.

15 Q -- and McClain?

16 A Yeah.

17 Q Were you aware that you had those warrants?

18 A I knew that I had the open container warrant.
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Q Okay. And I'm going to hand you what I'm going to go ahead and mark as Defendant's Exhibit No. 2. Have you ever seen that document before today?

A Not that I know of.

Q Okay. Does it appear to be an event report from the Cleveland County Sheriff's Office?

A Does it appear to be what?

Q An event report.

A Oh, yes.

Q Okay. And it shows your arrest date of September 17th, 2009?

A Yeah. Yes.

Q And it shows -- right next to that, it just has a time of 11:48. Do you think that's --

A That probably is accurate --

Q Okay.

A -- if that's what it says.

Q And it shows your arrest location is 12th and

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1 Lindsey, like you'd said?

2 A Yes. Sorry.

3 MR. ERDOES: You --

4 MS. FAGAN: Go ahead.

5 MR. ERDOES: Just for the record --

6 MS. FAGAN: Uh-huh.

7 MR. ERDOES: -- I mean, object to your one
8 question about -- you said 11:48 a.m. for the book-in
9 date?

10 MS. FAGAN: Arrest date.

11 MR. ERDOES: Arrest date. Okay.

12 MS. FAGAN: At the very top.

13 MR. ERDOES: All right.

14 MS. FAGAN: Yeah.

15 Q (By Ms. Fagan) And I think that's where Peter is
16 looking at, where it says "book date"?

17 MR. ERDOES: Yeah, I see that.

18 Q (By Ms. Fagan) It shows about 12:30:49. Do you
19 think -- that's about accurate?

20 A I -- I don't know. It wasn't morning-morning.

21 Q Yeah.

22 A I mean...

23 Q I think, earlier, you said it --

24 A I don't know. I mean, I would say 1:00 is what
25 it --

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1 Q Yeah.
2 A -- seemed like then.
3 Q Okay.
4 A I mean, I don't -- I don't remember.
5 Q Somewhere in that time period, early afternoon?
6 A Apparently.
7 Q It shows you were eventually placed in Cellblock
8 A -- A-pod, 301?
9 A Yes.
10 Q Who assigned you that cell?
11 A I don't know.
12 Q Okay. Do you recall being assigned to that
13 cell?
14 A If that was what the cell number was. I mean, I
15 know where it was -- it was up top.
16 Q Okay. You don't remember the actual number?
17 A I don't remember the number, no.
18 Q Okay. Were you able to pick your own cell or
19 were you assigned a cell?
20 A I'm sure they did not let me pick my own cell.
21 Q Okay. And the charges show exactly what you'd
22 said, the transporting the open container and the two
23 warrants and it looks like you were there, being held for
24 those warrants, correct?
25 A Yes.

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1 Q Do you know any of the other individuals who
2 were in the booking area with you on September 17th, 2009?

3 A No.
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17 Do you know how long you remained in the booking
18 area from the time you were brought to the Cleveland
19 County Detention Center to the time you were actually
20 placed in A-pod?

21 A A couple hours.
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Q So there were five total in your --

A (Nodded in the affirmative). Cell.

Q -- cell?

Okay. And did you have a pad that you were
provided --

A Uh-huh.

Q -- to sleep on?

A Yes. Yes.

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Q And when you were in the booking area, was Lacey Marez and Shaun Wadlow in the booking area before you arrived to the detention center or after?

A After.

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Q And tell me what you remember about Lacey and Shaun being brought in.

A I just remember -- the first thing I remember is that she was very pretty, very pretty young lady, and she was dressed really nice, had high heels on and looked really cute. And I think that they had came -- something and -- maybe -- she had her dog locked in her vehicle or something and they had -- and -- resulted them in jail. I don't know if that was the charges or what. And I just -- I just remember them two trying, you know, to converse and just making small talk.

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1 Q Okay. Lacey and Shaun were trying to talk?

2 A Yeah.

3 Q Okay. Were they separated --

4 A Oh, yes.

5 Q -- in the receiving --

6 A You can't -- they can't set female and male next
7 to each other. They at least try to set you across or...

8 Q So the females were on one of the benches --

9 A Yes.

10 Q -- and males were on the other bench?

11 A Yes, yes.

12 Q Okay. So they were just talking across the
13 room?

14 A Yeah.

15 Q Gotcha. Do you recall what they were talking
16 about?

17 A No. "I love you." They -- I mean, you know,
18 just --

19 Q Uh-huh.

20 A -- "We're going to jail" things, yeah.

21 Q And what was Lacey's demeanor when she was
22 brought into the jail?

23 A She was pissed, obviously, she was going to
24 jail, but, you know, it was what it was and...

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14 Q Do you recall what you and Lacee spoke about?

15 A We just talked about where we were from and who
16 we were and our lives and basi- -- you know, what we had
17 going on in life and addiction and boyfriends and kids and
18 things like that.

19 Q Do you recall the specifics of what Lacee told
20 you about what was going on with her and her kids --

21 A Ye- --

22 Q -- and that type of thing?

23 A I do. That she had been addicted to meth and
24 she had gotten off of it and now -- and that she was
25 currently addicted to opiates and had a very, very high

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1 addiction -- I mean, would take a lot of pills, and that
2 they lived together. And a past job -- she was telling me
3 about a job that she had that -- I think it was at a --
4 maybe a gun place or something, and she worked as a
5 secretary there, or they sold four-wheelers, something to
6 that. And she lived in south Oklahoma City and that her
7 mom was from Tecumseh, Shawnee area, which is where I'm
8 from, so talked about that.

9 Q Is there anything else you recall about your --
10 yours and hers (sic) discussion in that book-in area?

11 A At -- well, that -- she told me she was going to
12 withdraw, I mean, from her opiate addiction, and I, you
13 know, was speaking to her about that and -- that's
14 about -- basically, about all we talked about. Drugs.

15 Q Okay. And you said she said she was going
16 through withdrawal?

17 A She would. That she was going to go to jail,
18 and opiate addict -- they have withdrawals from opiates
19 and it causes severe stomach cramping and nausea and,
20 like, flu-like symptoms. And I knew that. I mean, I knew
21 all the symptoms of somebody on opiates because I had been
22 around people withdrawing before --

23 Q Okay.

24 A -- so...

25 Q And did she share what type of opiate?

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1 A I believe Lortabs is what she told me that she
2 took.

3 Q Okay.

4 A But she took, like, seven, eight at a time,
5 which is a lot.

6 Q And do you know if she -- I -- I guess -- if she
7 said she's going through -- or --

8 A No, it was --

9 Q -- going to be withdrawing --

10 A She would withdraw. She -- yeah.

11 Q So she had taken some earlier that day?

12 A She knew that she -- well, I'm -- I'm assuming
13 she did. You know, she was an addict. I'm...

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19 Q (By Ms. Fagan) When we took a break, we were
20 talking about your conversation with Lacey Marez there in
21 the booking area on September 17th, 2009. And she had
22 told you that she would be going through withdrawal since
23 she was arrested and was obviously being booked into the
24 jail; is that correct?

25 A Yes.

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1 Q Okay. And you said she had told you she was an
2 opiate abuser or addict?

3 A Uh-huh, yes.

4 Q Did she tell you about any other drugs that she
5 may have been --

6 A She had been --

7 Q -- using?

8 A No, not that she had been using, but she, in the
9 past, had been addicted to methamphetamines and got off of
10 them with the help of opiates and, now, was a full-blown
11 opiate addict, yes.

12 Traded one addiction for the -- another,
13 basically.

14 Q Did she ever tell you about using ice?

15 A That's methamphetamines.
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Q Did you see Lacey Marez filling out her medical
questionnaire?

A Yes.

Q Okay. Did you help her fill that out at all?

A Well, I told her that she needed to let them
know that she was going to be withdrawing from opiates. I
mean, she's going to need medical care.

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10 Q And you had mentioned a couple times that
11 something happened in the booking area, correct?

12 A Yes.

13 Q Tell me about that.

14 A She ingested some pills and --

15 Q Okay. Let me stop you there. Did you see --

16 A No.

17 Q -- where she got those pills from?

18 A I'm assuming that she had them on her person.

19 Q Okay. Go ahead.

20 A And -- I don't recall exactly how the jailers
21 came to notice that, but they did and then... I don't
22 know if it was, like -- spit them out or what -- how --
23 how that all went, but I know that there was a struggle.
24 Jackson got her and then Calista was the one that was
25 trying to get the pills out of her. And then that was --

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1 he put her, like, by her throat, by his hand, up against
2 the wall, and Calista is the one trying to do -- I guess
3 they call it a mouth sweep. And then after that, they
4 went to the back and it was just a ruckus. And then it
5 wasn't long after that, that I was moved upstairs.

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1 **Q** And you said she ingested some pills. Was that
2 there in the booking area?

3 **A** Yes.
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22 **Q** Did you see how that struggle started?

23 **A** I reme- -- I -- no -- I mean, yes, I did, but I
24 don't remember exactly how it started. They were
25 wanting -- I guess they knew she had something in her

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1 mouth and were wanting her to get rid of it, and she -- I
2 think -- I believe she was swallowing and then that's when
3 it resulted in Jackson pinning her and Calista trying to
4 get it out of her mouth, and then it went on beyond to the
5 drunk tanks.

6 Q And before we get there, do you recall any
7 guards saying anything or Lacee saying anything during
8 this time?

9 A No, I don't recall. I'm sure stuff was said,
10 but, no, I -- I mean...

11 Q Do you recall Mr. Jackson asking Lacee to spit
12 the drugs out?

13 A He probably did, I mean -- (nodded in the
14 affirmative).

15 Q And do you know whether or not she refused or...

16 A I'm sure she did.

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15 Q You said Calista was there, as well, and put her
16 hands --

17 A She stuck her fingers in her mouth, yes.

18 Q Okay. What was --

19 A Two fingers.

20 Q Two fingers?

21 A Yeah. Well, I know that's what you do a mouth
22 sweep with. I mean, it might have been three, but...

23 Q Okay. And what was Lacey doing during this
24 time?

25 A Struggling.

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Q Okay. But not being cooperative to spit the
drugs out or what --

A Right.

Q -- what -- okay.

Did you see whether Calista was successful in
getting the drugs --

A I think she got something out of her mouth
and -- yeah. But I think she had ingested quite a bit,
though, too. I mean, I think -- I believe she was chewing
them because there was stuff all over and on the -- her
hand -- Calista's hand --

Q Okay.

A -- so -- which could have been spit.

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Q Okay. After Calista was able to get some of the pills --

A Right.

Q -- out from Lacey's mouth, what was the next thing that happened?

A Lacey went in the back -- they -- they went to the drunk tanks, that way, and you can't see from there.

Q Okay.

A And then I was sent upstairs. I don't know how long after, a jailer moved me upstairs.

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9 Q And what happened as Lacee was brought into the
10 A-pod?

11 A She was given her mat and they closed the door
12 and she laid -- laid her mat down and I helped her get her
13 stuff and everything, and she just looked ill and she laid
14 by the toilet. We had her by the toilet, kind of like
15 this, and I was up against the wall. And I just asked
16 her, you know, what had happened and if she was okay and
17 she had said that they pumped her stomach, I believe.

18 Q Did she tell you if they had to take her, like,
19 off site or to a hospital --

20 A I think --

21 Q -- or it was done in-house?

22 A I don't -- no, they didn't do it in-house, I'm
23 sure, but -- I do think that she said they took her to the
24 hospital.

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Q Okay. What else do you recall about that specific day, September 17th, after she was brought into A-pod?

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A Well, that was -- it was nighttime. I mean, we were sleeping when she came in.

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Q Okay. Uh-huh.

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A So... After she was made comfortable and got her bed and blanket and everything, you know, we went back to sleep.

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Q Were you already asleep at the time --

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A I was.

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Q -- she was in?

A I was.

Q Okay. Did you talk to her about anything that you had seen --

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A No.

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Q -- in the booking --

A We went back to sleep after that.

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Q Okay. Did anything unusual or odd happen during that night, as you slept, or did anything wake you up?

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A No.

Q Okay. And what about -- did some -- or -- September 18th, that next day, so the --

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1 A Uh-huh.

2 Q -- day after you were arrested and both you and
3 Lacee were in A-pod.

4 A Uh-huh.

5 Q What can you tell me about that day?

6 A She was sick.

7 Q And --

8 A She just laid there. She had diarrhea. She
9 vomited. She wouldn't move. She wouldn't eat. She
10 didn't come out of that cell. I mean, she was ill.

11 Q Did she make any calls on the intercom there in
12 the cell, for medicine or -- diarrhea medicine or anything
13 like that?

14 A No, not that I recall.

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14 Q Okay. Other than her being sick, anything
15 unusual on the 18th, the day after you were arrested?

16 A Just -- I knew she was withdrawing. I -- I
17 mean, I've personally seen somebody withdraw, so I knew
18 what was going on.

19 Q Did it seem like her symptoms were pretty -- I
20 guess usual, or that's what a person withdrawing --

21 A Yeah.

22 Q -- will go through?

23 MR. ERDOES: Object to the form.

24 Q (By Ms. Fagan) Was there anything that she was
25 doing that would indicate that it wasn't just a

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1 withdrawal?

2 **A** No.

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Q I'm going to back up on that. When -- what is the -- when's the first day you approached a nurse or -- about Ms. Marez?

A That -- the next day, after we woke up, after, you know, we were brought in at med pass, so- -- it was brought to the attention. And, you know, every other time that the medical person was down there --

Q Okay.

A -- they were notified.

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Q That's fine. And how did you know those three individuals were nurses?

A Well, if they're not nurses, then I don't know what they are. They're passing the meds. They might have just been CMAs and able to pass meds, I don't...

Q Okay. You understood that they were the healthcare --

A Yes.

Q -- people?

A Yes. They were the person to go to if you needed any medical attention or medication or anything pertaining to any medical situations.

Q And this may be a silly question, but how did you know that those were the people to go to for those type of situations?

A Because they were the ones that pushed the cart to the door, to the sally port, and administered medications.

Q All right. Do you recall if they wore scrubs

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1 or --

2 A Yes, they wore scrubs.

3 Q Okay. So they had a separate uniform, if you
4 will, than --

5 A Yes.

6 Q -- the jailers --

7 A Yes, yes.

8 Q -- necessarily had?

9 A Yes.

10 Q Okay. And do you recall how many times on the
11 18th, which is that second day, that you spoke with
12 somebody from the nursing staff?

13 A I know twice.

14 Q Okay. Was it the --

15 A They come three times a day.

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Q Okay. What about when jail staff would come in to do site checks or to pass food, did you approach them as opposed to the nurses?

A I -- I would imagine.

Q Do you know, though?

A I'm sure. I mean, probably.

Q Would you know --

A Don't know.

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Q Tell me about the conversations -- and it doesn't matter which day it -- it is -- that you had with Lacee while in the cell, or while in A-pod.

A There wasn't a whole lot of conversation. She was sick. She was sleeping a lot.

Q Do you recall any conversations with her, at all?

A That she didn't feel good.

Q Anything beyond that?

A No.

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1 Q Okay. Do you know what time the church service
2 started?

3 A I do not.

4 Q Do you recall any of the church members that
5 came, their names?

6 A No, I do not know their names.

7 Q Okay. Prior to church starting, had meds been
8 passed that morning?

9 A Yes. That was early.

10 Q Do you know the nurse that passed meds on that
11 day?

12 A I do not.

13 Q Do you know if you spoke with the nurse on that
14 day?

15 A I don't believe so.

16 Q Okay. Did you talk to any of the church ladies
17 about Ms. Marez?

18 A I don't know if we did before or not. I don't
19 remember. I just remember sitting on the top, out by the
20 door, listening to them.

21 Q Okay. And were they providing a service?

22 A Yeah.

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10 Q And did anything happen during the church
11 service?

12 A That's when Kathy -- I believe she said my name
13 and said that something was going on with Lacey. I
14 believe she had been sleeping and it woke her up. I don't
15 know if she was gurgling or what actually -- I don't
16 remember, actually, what she said, but that's when me and
17 Angel Sherrell went in there and she was -- she looked
18 dead.

19 Q Did you, yourself, hear the gurgling?

20 A I couldn't hear the gurgling. That's what
21 Ka- -- had woke Kathy up and alerted us, and then that's
22 when I went in there and seen her and then started
23 screaming for help.

24 Q Okay. Did you hear anything unusual at all
25 happening in the cell?

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1 A No.

2 Q So the first alert you had that something was
3 going on --

4 A Was Kathy.

5 Q -- was Kathy?

6 A Yes.

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11 Q And tell me what it is that you saw, again.

12 A Well, she was laying on the floor and there was
13 stuff coming out of her mouth, like spit bubbles, I guess,
14 is what it was, or it might have been throw up. I don't
15 know. And she just looked like she wasn't there. I mean,
16 her color was completely worse than it had been and she
17 wasn't -- I didn't think she was breathing.

18 Q Were her extremities moving at all?

19 A No.

20 Q Legs, arms?

21 A She wasn't moving, period.

22 Q So once you observed that --

23 A I --

24 Q -- what's the next thing that happened?

25 A I screamed for help.

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1 Q Okay.

2 A And then -- I don't know who all came in there,
3 other than Kristin Hoffman, and that's who started the
4 CPR. Because she was a nurse, I think. There was a
5 couple people in the cell. I believe the church ladies
6 were also in there.

7 Q Okay. Did anybody, other than Kristin Hoffman,
8 assist with the CPR?

9 A (Nodded in the affirmative). I don't know who
10 it was.

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Q Okay. What's the next thing you recall happening?

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A I don't -- I remember somebody calling on the box that -- you know, I don't know if it was the church people doing it or if it was an inmate that did it, and we were instructed not to touch her, just to stop the CPR.

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Q And was that an instruction over the box?

A Over the box.

Q And do you know who gave you that instruction?

A I don't know who it was.

Q And what's the next thing that happened?

A I don't know who came in, if it was the -- I know the black male came in. I don't know who else came in with him.

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Q Okay. And when you say "the black male," is that one of the nurses?

A The nurse, uh-huh.

Q Okay. Was this black nurse -- was he amongst the first, outside of the church service --

A Yeah.

Q -- and the inmates, to --

A Yeah.

Q -- arrive?

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1 **A** Yes.

2 **Q** Okay. Did any other nurses or jail staff arrive
3 with this nurse?

4 **A** I don't know who arrived with him. It -- it all
5 happened so fast and it was chaotic.

6 **Q** Okay. Once the nurse arrived -- you said he --
7 it's a male, correct?

8 **A** Yeah.

9 **Q** Okay. Once he arrived, what did he do?

10 **A** I don't remember. I don't -- I -- I mean, I
11 honestly don't remember what happened directly after that.
12 I mean, I know she was eventually placed on the gurney
13 thing and then they carried her downstairs and we were
14 locked in the cells and could just see out the window.

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1 **Q** Okay. Do you know approximately how long it was
2 between when the call was first made over the intercom to
3 the time the nurse arrived?

4 **A** Minutes.
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Q But you're not saying that you saw her head
being slammed into the wall or to the floor multiple
times --

A No.

Q -- correct?

You -- you didn't see that, right?

A I just said no.

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Q Did you observe any signs of abuse on Lacey's
body?

A No.

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15 Q Okay. And the very next paragraph down, it
16 states, "Deputy McSwain stated that one of the inmates,
17 Dalana Parks, told her that she had observed Marez eat
18 some drugs after she was booked in and had seen a
19 detention specialist named Jackson attempt to prevent her
20 from swallowing them." Is there anything incorrect about
21 that statement?

22 A I don't -- I -- I mean, apparently, this is more
23 accurate, closer...

24 Q Closer in time?

25 A I guess I did observe her eat -- I mean, because

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1 I knew she did ingest them. I didn't -- don't recall -- I
2 mean, I, right now, don't recall if I remember actually
3 physically seeing her, but I mean this ha- --

4 Q But you agree, at the time, that's what --

5 A Yeah, I'll agree with that, yes.

6 Q Okay. The next sentence says, "Inmate Parks
7 told Deputy McSwain that, later, Marez told her that she
8 did swallow some of the drugs, but she did not know how
9 mu- -- or she didn't know how much."

10 A Okay. Well --

11 Q Does that trigger your memory to --

12 A That she --

13 Q -- that conversation?

14 A -- possibly could have, then.

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Q You -- you talked about how you spoke to one nurse that you believe -- believe was a woman, correct?

A (Nodded in the affirmative).

Q Can you tell me again what the substance of that conversation was?

A That she's sick, she's -- she's withdrawing from opiates and she's -- diarrhea and sick to her stomach and throwing up.

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Q (By Ms. Lee) I'm going to hand you what I marked
Defendant's Exhibit 6. And have you seen a document like
this before?

A Is this -- did I fill this -- one of these out?

Q Yes. Did you ev- --

A Okay.

Q Did you ever fill out one -- a document that
looked like this?

A I -- I don't know if -- I don't remember if it
looked like this. If this is what I filled out when I

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1 first came in.

2 Q You would agree with me that, on top there, it
3 says that this is the inmate questionnaire?

4 A Yes.

5 Q And that it goes through a series of medical
6 issues that an inmate might have had or might not have had
7 in the past?

8 A Uh-huh, yes.

9 Q Did you fill out a document like this when you
10 were in Cleveland County?

11 A I would imagine so.

12 Q And you spo- -- spoke earlier about Lacey
13 filling out one of these when she was sitting next to
14 you --

15 A Yes.

16 Q -- is that correct?

17 A Yes.

18 Q And you -- you said that you would have assumed
19 that she would have put in there that she was withdrawing
20 from opiates, correct?

21 A Yes.

22 Q And as you sit here today and you read through
23 this, do you see anywhere where it talks about her
24 withdrawing from opiates?

25 A I can't really read the back, what all this

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1 says.

2 Q Okay. Let's --

3 A "Yes, quit" -- I see, "Yes, quit."

4 Q Okay.

5 A "Yes, quit," something, "on..."

6 Q "On my own"?

7 A Okay. "Because drugs are stupid."

8 Q So it says, "Yes, quit on my own forever because
9 drugs are stupid and ruin your life." Do you see that?

10 A Yes, I do.

11 Q And it doesn't say that she is currently taking
12 drugs at that point?

13 A No.

14 Q Or that she's withdrawing from opiates, correct?

15 A I don't see it.

16 Q So at this time, when Lacey gave this
17 questionnaire to the Cleveland County Detention Center,
18 they would not have been on notice that she was
19 withdrawing from opiates?

20 MR. ERDOES: Object to the form.

21 Q (By Ms. Lee) According to this document?

22 MR. ERDOES: Same objection.

23 Q (By Ms. Lee) You can go ahead and answer.

24 A I don't see it on this document.

25

Cleveland County Sheriff

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Cleveland County Sheriff

Event Report

Parks, Dalana Leeann

SSN	[REDACTED]	Arrest Date	2009-09-17 11:48:00
AKA	Reeves	EventID	2000178708
DOB	[REDACTED]	Body Marks	
Age	34	Arrest Location	12th And Lindsey
Sex	F	Arresting Agency	CCSO
Race	W	Book Officer	Hullett
Eyes	BRN	InsDate	
Height	508	Arresting Officer	Killman
Weight	190	Cell/Blk	A 301
Hair	BRN	BookDate	2009-09-17 12:30:49
Arrests	1	Wrecker	Quality
Birth City/State	Shawnee/OK	Property Location	
Citizenship	US	Citizenship Verified	No
Insurance			

Medical

Doctor		Symptoms	None	Movement	Good
Injuries	None	Trauma	None	Amputations	
Heart & Lungs	<input type="checkbox"/>	Diabetes	<input type="checkbox"/>	Epilepsy	<input type="checkbox"/>
Self Dest	<input type="checkbox"/>	Coherent	<input checked="" type="checkbox"/>	Violent	<input type="checkbox"/>

Addresses

	Name	Address	City	State	Zip	Phone
Personal	Dalana Parks	600 Beauford Pl #28	Jessamine	KY	40356	(405)-579-1132
Employment	Unemployed					
Next of Kin	Judy Richardson	820 E Lindsey Ave #4	Norman	OK	73071	(405)-579-1132

Charges

Type	CaseNum	Charge	Cnt	RelAuth	RelBy	RelDate
Jail Sentence	JailBond	ArrBond	HldAgncy	HldAuth	HldNotify	HldDate
S	T20002803	Transporting Open Container-Beer	1	Or Pr	Vassar	2009-09-18 15:59:40
	142.00					
H	None	Hold Pottawatomie Co	1	Trans Mcolain Co	Bullard	2009-09-24 09:10:41
		Pottawatomie Co		Warrant	Y	2009-09-17 12:38:08
H	None	Hold Mcolain Co	1	Trans Mcolain Co	Bullard	2009-09-24 10:27:56
		Mcolain Co		Warrant	Y	2009-09-17 12:38:32

Notes

- [2001-02-07] Added 'Reeves'
- [2009-09-17] Changed 'DOB' From [REDACTED] To [REDACTED]
- [2009-09-17] Changed 'LicNum' From " To 'R02697122'
- [2009-09-17] Changed 'LName' From 'Reeves' To 'Parks'
- [2009-09-18] Changed 'LicNum' From 'R02697122' To 'R02697122 / KY'

Local Warrant Status

Dispatcher

Arresting Officer Signature

- ☐ IN
☐ EXIT

